

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,  
and Bernard L. Madoff,

Plaintiff,

v.

BANK HAPOALIM B.M. and BANK  
HAPOALIM (SWITZERLAND) LTD.,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01216 (SMB)

**STIPULATION EXTENDING TIME TO RESPOND  
AND ADJOURNING THE PRE-TRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein,  
that the time by which defendants Bank Hapoalim B.M. and Bank Hapoalim (Switzerland) Ltd.  
("Defendants") may answer, move against, or otherwise respond to the Trustee's complaint  
("Complaint") is extended up to and including June 30, 2014. The pre-trial conference will be  
adjourned from July 30, 2014, at 10:00 a.m. to August 27, 2014, at 10:00 a.m.

The purpose of this stipulated extension (“Stipulation”) is to provide additional time for Defendants to answer, move against, or otherwise respond to the Complaint. This is the eleventh such extension with respect to defendant Bank Hapoalim B.M. and the ninth such extension with respect to defendant Bank Hapoalim (Switzerland) Ltd. Nothing in this Stipulation is a waiver of the Defendants’ right to request from the Court a further extension of time to answer, move against, or otherwise respond to the Complaint and/or the Trustee’s right to object to any such request.

The parties to this Stipulation reserve all other rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photocopy, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 5600).

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Dated: April 10, 2014  
New York, New York

/s/ Thomas L. Long  
**BAKER & HOSTETLER LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Thomas L. Long  
Email: tlong@bakerlaw.com  
Mark A. Kornfeld  
Email: mkornfeld@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Estate of Bernard L. Madoff*

/s/ Jonathan Cross  
**HERBERT SMITH FREEHILLS  
NEW YORK LLP**  
450 Lexington Avenue  
New York, New York 10017  
Telephone: (917) 542-7600  
Facsimile: (917) 542-7601  
Scott. S. Balber  
Email: scott.balber@hsf.com  
Jonathan Cross  
Email: jonathan.cross@hsf.com

*Attorneys for Bank Hapoalim B.M. and Bank  
Hapoalim (Switzerland) Ltd.*